

**The Honorable John A. Ross
United States District Court Clerk
111 South 10th St.
St. Louis, Missouri 63102**

**RE: United States of America v. Michael Bakale
Case No.: 4:21CR287 JAR**

Your Honor:

My name is Elizabeth Bakale. I have been an accountant in St. Louis since 2010 and worked my way to lead accountant in that time. Michael Bakale was my husband for five years. I have known Michael since 2014 and have always known him to be a good, hardworking person. I remember at one point he was working with some colleagues who were near retirement. They all retired around the same time leaving the department very short-handed. He took it upon himself to pick up the slack and ensure the work continued in spite of the longer hours it meant for him. Michael's efforts were a topic of conversation at the work picnic I attended with him, garnering him praise from his co-workers. Michael and I were married in 2017 and even though we are now divorced, I still respect and care about him a lot.

I recall the night I learned that Michael was being charged with a crime concerning a minor. I remember being in shock and discussing it with him. His tone and words were filled with considerable remorse. While the seriousness of his crime or any crime involving a minor is significant, I believe the good of a person is not dictated by one action, but by the whole of a person's life.

Having lived with Michael through the majority of this ordeal, he has been humble and accepting that his actions have consequences. Every condition the court placed on his day-to-day life he has accepted and strove to meet completely. He has held a job, per the court's requirement, and been an asset to the company which hired him. He has attended therapy regularly, maintained curfew, and communicated any circumstances outside of his control in a timely manner. All the while, he has made time to help me when I needed, to the best of his ability, in dealing with these changes to our home life. I am certain he has regret for his actions and for those he hurt. I have no doubt he wants to do everything he can to better himself and am certain he will succeed in that endeavor. Thank you for giving me this opportunity to write to you on his behalf.

Sincerely,

Elizabeth Bakale

The Honorable John A. Ross
United States District Court Clerk
111 South 10th St.
St. Louis, Missouri 63102

Re: United States of America v. Michael Bakale
Cause No.: 4:21cr287 JAR

Your Honor:

Never did I think that I would be writing a letter such as this. My husband and I were blessed with four children who we love dearly. Our son Michael was our second born. I was primarily a stay-at-home mom. My husband was a Revenue Agent. After thirty-eight years of service with the IRS he retired. Our children were raised to be good people with Christian values. Obviously, it came as a great shock to learn that Michael was charged with a felony act that involved a minor. As parents and grandparents we fully recognize the harm that such a crime has upon individuals, as well as, society. This was an extremely difficult thing to make sense of in light of our relationship with Michael who has always shown himself to be polite, responsible, hardworking, respectful and caring.

Michael has spent the majority of his life behaving as a good citizen. He was very independent, yet he enjoyed his connections to family. When he purchased his home in Saint Louis he felt that it was important for it to be a place where we could gather. He always made us feel welcomed and loved. When his younger sister moved out on her own after college Mike helped her to buy her first car. In 2012 when my husband had a stroke Michael came to Ohio to help me manage his father's medical needs.

What I am trying to say is that this one incident is not the totality of who Michael is and what he means--neither to us as his family nor to me as his mother. Our son will always be loved by us. That being said, it is understandable that any wrongdoing must be addressed. We know that God's love and mercy is all encompassing. We also understand that actions have real consequences.

Michael was a medical physicist working with oncology patients. He had both the education and the skill to assist in a field meant for saving lives. It is disheartening to see him lose the capacity to ever serve in this way again. We would like to see him somehow be able to make a positive impact despite these circumstances. Michael has accepted every condition the court has placed upon him thus far without complaint. He has always been someone who stands on his own two feet. We will continue to offer him our support in any way we can. Our hope is that with humility and contrition Michael can be the better person he was meant to be. In our hearts we know he has it in him. Thank you for giving us this opportunity to write to you.

Sincerely,

Mr. and Mrs. Michael Bakale, Sr.

The Honorable John A. Ross
United States District Court Clerk
111 South 10th St.
St. Louis, Missouri 63102

Re: United States of America v. Michael Bakale
Cause No.: 4:21cr287 JAR

Your Honor:

Thank you for providing us with the opportunity to write you regarding my brother, Michael Bakale, and for taking the time to read through these correspondences. My name is Trista Allgood, I'm Michael's younger sister, a stay-at-home mom to two young boys (although technically number 2 arrives this August). Micky and I have always been pretty close, despite often living across the country from one another. I only recently moved closer after the birth of my first son. We drove from California to Chicago in Dec 2020 with our 6 mos old, two cats, and a pandemic in full swing, no easy feat as you can imagine. But of course, Micky made himself available when I passed through St. Louis for whenever I arrived, regardless of day or time or ever-changing schedules, to finally meet his first nephew and spend some time with us for which I am so thankful.

HIs reliability, compassion, and understanding are why it's always been easy to be close with him. Whether it's been a day since we last spoke or 8 months, there is never distance that grows between us. He greets every conversation we have with respect, humor, and no judgement; happy to offer advice if I need it or just lend an ear and crack a joke. I attribute these qualities as to why he is always surrounded by friends from all walks of life (from antique dealers to poodle breeders, if you have a story to tell, he is happy to hear it and then tell his sister about it) and his ability to work in a field that would be emotionally and mentally exhausting for many. When he has an opportunity to be there for someone, whether friend or stranger, he is available. He is generous in both time and money to those around him, never malicious or mean-spirited.

Michael has worked hard his whole life, taking on whatever odd job he needed to in order to support himself through school, depriving himself of all but the bare essentials, but still willing to give what he could to help his siblings and family. And even when misfortune comes his way during what may already be trying circumstances, he still meets it with positivity. I remember when he was in grad school with all of his money going towards bills barely having enough for groceries, he called me to tell me that someone had tried to steal his car. But no, he was not stressed, he was blessed with good fortune because joke was on the thief. His battery had died earlier that day (it was a real piece of junk car) so the thief couldn't get it to start in order to steal it. No harm, no foul.

He is a pillar of strength for his family, friends, and peers. The voice of reason, calmness, and optimism, considering all sides of any problem and helping us determine a reasonable path forward, easing our fear and anxiety as we deal with life's hurdles. My brother didn't ask me to write this because he would never. He will always ask more of himself and take on the burden than he would ever ask of others. I can imagine it's conflicting to hear someone described as selfless when you only know them as committing an act that is inherently

selfish but this is who I know my brother to be. Dutiful, compassionate, kind-hearted - not just to family, but to all.

I respectfully ask for leniency, not because he deserves to skirt punishment but out of my own fear of losing the friendly, optimistic, loving person I know my brother to be and the impact he has on everyone in his life. This crime is one that is not easily forgiven by society and he will carry the weight of it for the rest of his life. If there's any possibility for him to reenter society sooner so that he can rebuild himself and his life, I do believe it would be beneficial to not only his family but many because of the positive contributions I know he is capable of. Thank you again for taking the time to read my family's letters and for any consideration.

Sincerely,
Trista (Bakale) Allgood

**The Honorable John A. Ross
United States District Court Clerk
111 South 10th Street
St. Louis, Missouri 63102**

**Re: United States of America v. Michael Bakale
Cause No.: 4:21cr287 JAR**

Your Honor:

The Defendant, Michael Bakale, on whose behalf I am writing to you, is one of my younger siblings. As an educator who is about to begin his eighteenth year of teaching Latin to high-school students, let me firmly state that I consider the Defendant's crime with the utmost gravity. I am deeply saddened and disturbed by my brother's actions, and I believe that it is necessary for him to face appropriate consequences for that which he has done.

With that having been said, I do wish to apprise you of my brother's character (as I know of it) as you decide those consequences. As children, Michael and I were fast friends -- riding our bikes about the neighborhood, building (somewhat lackluster) snow-forts in the backyard, competing against one another in Mario Kart. As adults, even though we moved to different regions of the country (he to St. Louis, I to Boston), and even though we found ourselves busy with our own careers and our own circles of friends, it was ever pleasant to have an opportunity to chat with him, particularly during the holidays when we would often reconvene at my parents' home in Cleveland. He has, for as long as I have known him, been amiable, intelligent, and fairly even-tempered. He was a welcoming and gracious host, when he held family gatherings at his own home. His generosity has been noteworthy, whether it was offering financial help to my sister, when she was fresh out of college, or my parents, who have always been of modest means. After my father was afflicted by a stroke some years ago, Michael rushed to offer my parents whatever assistance he could, particularly in the organization of my father's medical appointments as he was recovering. I also should not fail to mention, as I list what I have known to be his positive qualities, that which I have *never* witnessed him to be -- violent. Even in arguments, he generally maintained a calm demeanor, and I cannot recall any instance of him becoming involved in a physical altercation of any sort.

You have my gratitude for allowing me to present to you my personal knowledge of the Defendant, and I trust that you will give this information some consideration as you decide what is just.

Sincerely,



Gabriel S. Bakale

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No.: 4:21-cr-287 JAR
)
MICHAEL BAKALE,)
)
Defendant.)

AFFIDAVIT OF ADAM ALLGOOD

COMES NOW AFFIANT, Adam Allgood, and being first duly sworn upon his oath states and affirms the following:

1. My name is Adam Allgood, and I am married to Michael Bakale's sister.
2. I am a 34-year-old adult and a software engineer.
3. I have known Michael Bakale for approximately 8 years.
4. I am aware of the details of the offense to which Michael is being sentenced.
5. I know Michael met with a minor female for sexual purposes.
6. I do not condone Michael's conduct and understand why it constitutes a crime.
7. I, myself, am the father of a two-year-old boy and my wife is expecting our second child shortly.
8. My wife, Trista Allgood is the mother of both of my children.
9. Like all fathers, I put my child's safety and well-being above all else.
10. I would not subject my child or any other child to harm.
11. Nor would I allow Michael to have contact with my children if I thought Michael posed a threat to them.

12. Michael does not pose a threat to my children, and I want Michael to participate in the lives of my children.

13. I have observed Michael as an uncle to my son.

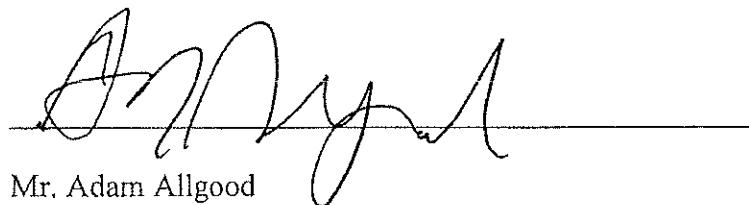
14. I expect my children to visit with family and attend family gatherings as they grow.

15. My wife, Trista, and I have discussed the matters referenced in this affidavit.

16. We hope you will authorize Michael to have supervised contact with our children without the prior permission of the probation office or this court.

17. I or my wife will provide this supervision.

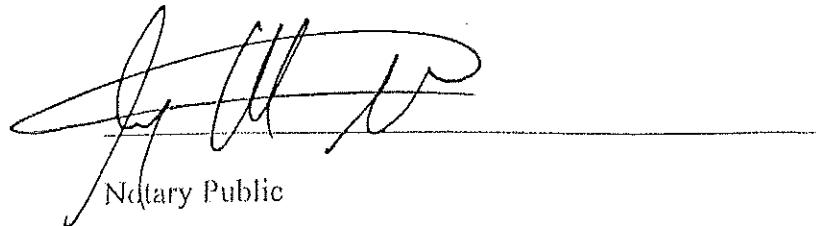
FURTHER AFFIANT SAYETH NOT



Mr. Adam Allgood

COUNTY OF ST. LOUIS)
)
STATE OF MISSOURI)
)

Sworn to and affirmed before me on this 11th day of August 2022.



Notary Public

My Commission expires: August 13, 2022



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No.: 4:21-cr-287 JAR
)
MICHAEL BAKALE,)
)
Defendant.)

AFFIDAVIT OF TRISTA ALLGOOD

COMES NOW AFFIANT, Trista Allgood, and being first duly sworn upon her oath states and affirms the following:

1. My name is Trista Allgood, and I am Michael Bakale's sister.
2. I am a 35-year-old adult and a stay-at-home mother.
3. I have known my brother since birth and was raised in the same household.
4. I am aware of the details of the offense to which Michael is being sentenced.
5. I know Michael met with a minor female for sexual purposes.
6. I do not condone Michael's conduct and understand why it constitutes a crime.
7. I, myself, am the mother of a two-year-old son with another child due shortly.
8. My husband, Adam Allgood is the father of both of my children.
9. Like all mothers, I put my child's safety and well-being above all else.
10. I would not subject my child or any other child to harm.
11. Nor would I allow Michael to have contact with my children if I thought Michael posed them a threat.

12. Michael does not pose a threat to my children, and I want Michael to participate in the lives of my children.

13. I have observed Michael as an uncle to my child.

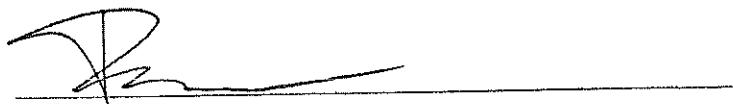
14. I expect my children to visit with family and attend family gatherings as they grow.

15. My husband, Adam, and I have discussed the matters referenced in this affidavit.

16. We hope you will authorize Michael to have supervised contact with our children without the prior permission of the probation office or this court.

17. I or my husband will provide this supervision.

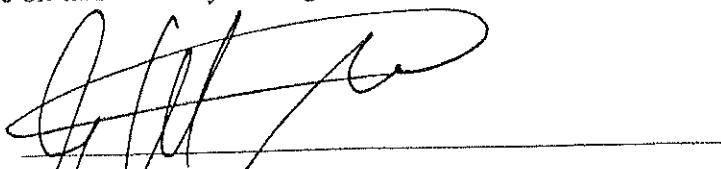
FURTHER AFFIANT SAYETH NOT



Ms. Trista Allgood

COUNTY OF ST. LOUIS)
)
STATE OF MISSOURI)
)

Sworn to and affirmed before me on this 11th day of August 2022.



Notary Public

My Commission expires:

August 13, 2022

